

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE LIBOR-BASED FINANCIAL INSTRUMENTS ANTITRUST LITIGATION	MDL No. 2262 ECF Case
<p>THIS DOCUMENT RELATES TO:</p> <p>THE FEDERAL HOME LOAN MORTGAGE CORPORATION, Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BANK OF AMERICA CORPORATION et al., Defendants.</p> <p>PRINCIPAL FINANCIAL GROUP, INC. ET AL., Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>BANK OF AMERICA CORPORATION et al., Defendants.</p> <p>PRINCIPAL FUNDS, INC. ET AL., Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>BANK OF AMERICA CORPORATION et al., Defendants.</p> <p>FEDERAL NATIONAL MORTGAGE ASSOCIATION, Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BARCLAYS BANK PLC. et al., Defendants.</p> <p>BAY AREA TOLL AUTHORITY, Plaintiff,</p> <p style="text-align: center;">v.</p> <p>BANK OF AMERICA CORPORATION et al., Defendants.</p> <p>FEDERAL DEPOSIT INSURANCE CORPORATION AS RECEIVER FOR AMCORE BANK, N.A et al., Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>BANK OF AMERICA CORPORATION et al., Defendants.</p>	<p>No. 13-cv-03952-NRB</p> <p>No. 11-md-2262-NRB</p> <p>No. 11-md-2262-NRB</p> <p>No. 13-cv-7720-NRB</p> <p>No. 11-md-2262-NRB</p> <p>No. 14-cv-01757-NRB</p>

Pursuant to 28 U.S.C. § 1746, I, Sally Scutt, declare and state as follows:

1. I am the Deputy Chief Executive of the British Bankers' Association (the "BBA"). I have held this position since July 24, 2001. I am personally familiar with the facts set forth in this declaration.
2. I submit this declaration in support of the Joint Memorandum of Law In Support Of Defendants' Motion To Dismiss The Direct Actions For Lack Of Personal Jurisdiction, to the extent that motion seeks dismissal of the following actions naming as defendants the BBA, BBA Enterprises Ltd. ("BBA Enterprises"), and BBA LIBOR Ltd. ("BBA LIBOR")¹ (collectively, the "BBA Defendants"): *Fed. Home Loan Mortg. Corp. v. Bank of Am. Corp., et al.*, 13-cv-03952 (S.D.N.Y.); *Principal Fin. Grp., Inc, et al. v. Bank of Am. Corp., et al.*, 11-md-2262 (S.D.N.Y.); *Principal Funds, Inc., et al. v. Bank of Am. Corp., et al.*, 11-md-2262 (S.D.N.Y.); *Fed. Nat'l Mortg. Ass'n v. Barclays Bank PLC, et al.*, 13-cv-7720 (S.D.N.Y.); *Bay Area Toll Auth. v. Bank of Am. Corp., et al.*, 11-md-2262 (S.D.N.Y.); and *Fed. Deposit Ins. Corp. et. al. v. Bank of Am. Corp.*, 14-cv-01757 (S.D.N.Y.).
3. The BBA is an unincorporated trade association based in the United Kingdom.
4. The BBA wholly owns BBA Enterprises and BBA LIBOR. The BBA Defendants have no other subsidiaries or affiliates.
5. BBA Enterprises and BBA LIBOR are companies registered in England and Wales.
6. The BBA Defendants share a sole office located at Pinners Hall, 105-108 Old Broad Street, London EC2N 1EX, United Kingdom.

¹ On or about September 25, 2014, BBA LIBOR Ltd. changed its name to BBA Trent Ltd.

7. The BBA Defendants do not have any branches, offices, subsidiaries, or affiliates in the United States, or anywhere outside the U.K.

8. The BBA Defendants do not have any officers or employees in the U.S., or anywhere outside the U.K.

9. The BBA Defendants do not have any operations in the U.S., or anywhere outside the U.K.

10. The BBA Defendants do not have a telephone number or address in the U.S., or anywhere outside the U.K.

11. The BBA Defendants do not own or lease any real estate anywhere in the U.S., and, with one exception, do not own or lease any real estate anywhere outside the U.K. Outside the U.K., the BBA subleases limited office space from the European Banking Federation in Brussels, Belgium, which is used by the BBA's employees when they travel to Brussels in connection with the BBA's European Union policy work and lobbying.

12. In 2004, the BBA registered with the U.S. Secretary of the Senate and the Clerk of the House of Representatives under the Lobbying Disclosure Act, 2 U.S.C. § 1605, in connection with its lobbying activities in the banking sector. In 2007, the BBA registered a trademark for "bbaLIBOR" with the U.S. Patent and Trademark Office, as well as with the trademark authorities of other countries. The BBA is not authorized or licensed to do business anywhere in the U.S.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 5th day of November, 2014 in London, United Kingdom.


Sally Scutt